

E-filed 1/22/07

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Attorney for Defendants, JOSEPH K. FASULO, and BERLINER COHEN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TAMRA CURTIS,)	Case No. C-06-06684 JF PVT
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED
vs.)	ORDER] CONTINUING CASE
)	MANAGEMENT CONFERENCE
BERLINER COHEN LAW FIRM, JOSEPH)	
K. FASULO,)	
Defendants.)	

STIPPULATION

Counsel for the parties stipulate as follows:

1. Plaintiff's complaint was served on defendants on December 4, 2006. On December 22, 2006, defendants moved the Court for an order dismissing plaintiff's complaint in its entirety. Said motion is scheduled for hearing on February 16, 2007.
2. The Case Management Conference is currently scheduled for January 26, 2007. ADR certificates and initial disclosures are due prior thereto.
3. The parties desire to have a ruling on the defendants' motion to dismiss prior to making initial disclosures, and prior to the Case Management Conference, and for that reason

1 move the Court for an order continuing the Case Management Conference to April 13, 2007.
2 April 13, 2007 is requested because defense counsel is scheduled to be out of the country from
3 March 12th through April 3rd.

4 4. Counsel shall meet and confer, and comply with Local Rule 16-8, no later than March
5 23, 2007. Initial disclosures shall be made no later than April 6, 2007.

7 Dated: January 8, 2007

/s/ Norman Newhouse
Counsel for Plaintiff

10 Dated: January 9, 2007

/s/ Steven R. Manchester
Counsel for Defendants

12 ORDER

13 PURSUANT TO STIPULATION, IT IS SO ORDERED.

14 Date: 1/19/07


Jeremy Fogel
District Court Judge